

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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YIEN-KOO KING, NORTHWICH :
INVESTMENTS LTD., and SOON HUAT, :
INC. :

Plaintiffs, :

-against- :

ANDREW WANG, SHOU-KUNG WANG, :
BAO WU TANG, JIAN BAO GALLERY, :
ANTHONY CHOU, CHEN-MEI-LIN, WEI :
ZHENG, YE YONG-QING, YUE DA-JIN :
and JOHN DOES 1-9, :

Defendants. :

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Civ. Action No.: 1:14-cv-07694 (LJL)

NOTICE OF MOTION

Oral Argument Requested

PLEASE TAKE NOTICE upon (i) the Declaration of Thomas B. Kelly, dated April 13, 2020 and the exhibits annexed thereto; and (iii) the Memorandum of Law, and, and upon all the prior pleadings and proceedings had heretofore herein, defendant Andrew Wang, by his attorneys Kasowitz Benson Torres LLP, shall move this Court at a date and time to be determined by the Court, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rule 56.1 of the Local Civil Rules striking: (1) the “Statement of Uncontested Material Facts in [Su]pport of Plaintiff’s Motion for Partial Summary Judgment Finding Andrew Wang Liable for Breach of His Fiduciary Duty,” and (2) portions of the Declaration of the Public Administrator Of New York County, dated February 14, 2020, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
April 13, 2020

By: /s/ Thomas B. Kelly
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